

Leon Dayan, SBN 153162
Abigail V. Carter*
Ramya Ravindran*
Lane M. Shadgett*
J. Alexander Rowell*
BREDHOFF & KAISER P.L.L.C.
805 Fifteenth Street NW, Suite 1000
Washington, D.C. 20005
Tel. (202) 842-2600
Fax (202) 842-1888
ldayan@bredhoff.com
acarter@bredhoff.com
rravindran@bredhoff.com
lshadgett@bredhoff.com
arowell@bredhoff.com
*Application *pro hac vice* pending

Daniel Feinberg, SBN 135983
Catha Worthman, SBN 230399
Anne Weis, SBN 336480
**FEINBERG, JACKSON, WORTHMAN
& WASOW, LLP**
2030 Addison Street, Suite 500
Berkeley, CA 94704
Tel. (510) 269-7998
Fax (510) 269-7994
dan@feinbergjackson.com
catha@feinbergjackson.com
anne@feinbergjackson.com

Attorneys for Plaintiffs (Additional Counsel not listed)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants.

Case No. 3:25-cv-03070-JD

**DECLARATION OF SHARDA
FORNNARINO**

Declaration of Sharda Fornnarino
Case No. 3:25-cv-03070-JD

DECLARATION OF SHARDA FORNNARINO, RN

I, Sharda Fornnarino, RN, declare as follows:

1. I have knowledge of the facts set forth herein and, if called as a witness to testify to these facts, could competently do so.

2. I am a Registered Nurse (“RN”) employed at the Rocky Mountain Medical Center (“Denver VA”), which is a Department of Veteran’s Affairs (“VA”) hospital. I have been employed as an RN there for 25 years. I have previously worked in the Medical/Surgical Unit and in the Intensive Care Unit of the Denver VA. For the last nine years, I have worked as a Specialty Clinic Nurse in the Dermatology Unit. I primarily provide patient education about skin diseases including skin cancer. I provide follow up advice and education to veterans who have undergone dermatology procedures in the Dermatology clinic at the Denver VA. I also order supplies for the clinic.

3. I am a Navy veteran. I enlisted in 1991 during the first Gulf War. I was active duty for four years and deployed overseas. I served an additional eight years in the reserves. While in the Navy, I was a Naval Corpsman and served as a Psychiatric Technician. I was part of a team of active duty service members who provided medical care to other active duty service members.

4. In the Navy, active-duty service members receive their medical care at Active Duty Hospitals located on Naval bases. They receive care from other active-duty service members including Corpsmen, nurses, and doctors. No employees of the VA work at Active Duty Hospitals.

5. I am a member National Nurses Organizing Committee/National Nurses United (“NNOC/NNU” or “Union”), and serve on the Board of Directors for the Union. I am also the VA Unit Secretary for the Union.

6. NNOC/NNU has a collective bargaining agreement with the VA. The collective bargaining agreement covers a bargaining unit of approximately 16,000 RNs who are employed at 23 hospitals across 13 states. The collective bargaining agreement covers the period from May 26, 2023 until May 26, 2026.

7. Through the Union, RNs employed at VA hospitals are able to advocate for safe staffing. This is one of the most critical issues for nurses and their patients and has been a priority for NNOC/NNU. When hospitals are short staffed, the likelihood that an RN will be injured or that

1 a patient will receive substandard care increases. The Union advocates for safe staffing by
2 preparing a submitting safety reports, documenting staffing conditions through “Assignment
3 Despite Objection” forms, and delivering petitions to management concerning staffing issues.

4 8. Through our Union, there is a designated Safety Officer for each VA facility, and
5 also national Safety Officers. These Safety Officers are essential to safe patient care. They walk
6 around the hospital to identify hazards to nurses and patients. This includes things like exposed
7 electrical outlets and dangerous objects in the psychiatric unit that could be used to injure RNs and
8 other staff. Because of our collective bargaining rights, Safety Officers and other Union leaders at
9 the Hospital can report on safety issues without fear of retaliation.

10 9. Safety at work is especially important to me because I was permanently injured at
11 work approximately 13 years ago while transferring a patient from a chair to a bed at the Denver
12 VA.

13 10. RNs are patient advocates, so our ability to speak up for them without fear of
14 retaliation is directly connected to high standards of care for our nation’s veterans. If nurses are
15 afraid to speak up, veterans’ care will suffer.

16 11. Nursing is a 24-hour, 7-day per week occupation that can be extremely stressful and
17 challenging. Our collective bargaining agreement establishes uniform standards, policies and
18 procedures on important issues that make RNs’ jobs more sustainable. This includes predictable
19 scheduling, fair disciplinary procedures, policies on floating to other units, a culture of safety, and
20 a mechanism for addressing issues and efficiently resolving grievances.

21 12. If we no longer have a union for VA RNs, there will be more hazards and safety
22 issues at work. There will also be more arbitrary decisions by individual supervisors in place of
23 uniformity. Worst of all, RNs will be less likely to speak up for their patients out of fear of
24 retaliation.

25 13. A significant Reduction in Force (“RIF”) for the VA has been announced. It has
26 been reported that the VA intends to eliminate 80,000 jobs. Our collective bargaining agreement
27 includes provisions on how a RIF may be carried out. I am very worried about facing the
28 announced Reduction in Force (“RIF”) without collective bargaining rights.

1 14. I have heard from colleagues in the patient care and research units that they are
2 afraid to speak up about workplace issues because of President Trump's actions.

3 15. I spend the majority of my workweek providing direct patient care. I also spend
4 approximately 20% of my workweek on "official time." My official time is spent attending
5 grievance meetings, doing factfinding in disciplinary cases, and acting as a resource for colleagues
6 to efficiently resolve issues they are having at work.

7 16. Neither I nor anybody I work with does any work relating to national security. I was
8 very surprised to hear President Trump saying that collective bargaining for VA nurses is
9 inconsistent with National Security. We are not at war, and even in wartime I have never heard of
10 VA staff being used for national security. As a VA RN, I have never taken care of an active duty
11 service member.

12
13 I declare under penalty of perjury under state and federal law that the foregoing is true
14 and correct.

15 Executed on April 3, 2025, at Tampa, Florida.

16
17 
18 Sharda Fornnarino, RN